REMARKS

Applicants respectfully request reconsideration and allowance of the above-identified patent application. Claims 17-21, 23, and 45-47 are pending in the application, wherein claims 17-21 and 23 have been amended, claims 45-47 are new, and the remaining claims have been currently or subsequently canceled.[1]

Initially, Applicants note with appreciation the Examiner's consideration of the documents submitted with the Information Disclosure Statement (IDS) filed on September 2, 2005.

Applicants note that in response to the previous communication, the Office Action alleges that degradation and compression as previously claimed are separate steps and/or modules.[2] Although Applicants respectfully disagree with the Examiner's interpretation of what the current Specification discloses, in the interest of expediting prosecution Applicants have amended the claims.[3] Nevertheless, Applicants reserve the right to revive such claims and arguments as previously presented in future communications. Accordingly, any arguments and amendments made herein should not be construed as acquiescing to any previous allegation made by any Office Actions of record.

The Office Action rejects all of the previous pending claims under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,202,211 to Williams, Jr. ("*Williams*") in view of Richardson, et al., "*Virtual Network Computing*," IEEE Internet Computing, January-February 1998, pp. 33-38 (*"Richardson"*).[4] For at least the foregoing reasons, Applicants respectfully traverse these grounds of rejection.

Applicants' invention, as recited for example in independent apparatus claim 17 relates to compressed video transmission of display commands representing user interfaces for various programs. The remote computing server system includes: a server, executing a plurality of programs, each of which generates a set of display commands which represent original display

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[1] Support for the claim amendments can be found throughout the Specification, including ¶ [027].

[2] Applicants respectfully note that any such allegation should more appropriately be raised within a rejection under 37 U.S.C. §112, first paragraph. As such, Applicants respectfully request that such allegations in the future be made under this section in order to allow Applicants a full and fair opportunity to respond to such allegations.

[3] For example, ¶¶ [079], [0166]-[0168], [0183], and other portions of the Specification, when read as a whole, would apprise one of ordinary skill in the art that the degradation of display elements may take place before, during, or even after the compression of such elements into compressed video.

elements of a user interface for each of said plurality of programs; an analysis module for comparing the original display elements with a set of predefined display elements stored at the server, wherein responsive to transmission bandwidth limitations that are identified by the server, the analysis module selects corresponding modified display elements from the set of predefined display elements that are most similar to one or more of the original display elements, the set of predefined elements compiled to simplify compression in accordance with said transmission bandwidth limitations; a video compressor which receives the modified display elements selected above and generates there from a compressed video stream for each one of said plurality of programs; and a transmitter for the transmission of the plurality of compressed video streams to one or more remote locations.

Applicants' invention, as recited for example in independent method claims 20 and 45 also relate to compressed video transmission of display commands representing user interfaces for various programs and include similar and additional elements as those described above with regard to claim 17. Accordingly, the following discussion will primarily focus on the elements of claim 17; however, similar and other arguments will also apply to these independent claims.

Applicants respectfully submit that the combination of *Williams* and *Richardson* does not render claims 17, 20, and 45 unpatentable for at least the reason that the combination does not disclose or suggest all of the elements of these claims.[5] For example, the combination of *Williams* and *Richardson* does not disclose or suggest: an analysis module for comparing the original display elements with a set of predefined display elements stored at a server. As such, the combination cannot possibly disclose or suggest that responsive to transmission bandwidth limitations that are identified by the server, the analysis module selects corresponding modified display elements from the set of predefined display elements that are most similar to one or more of the original display elements, the set of predefined elements compiled to simplify compression in accordance with said transmission bandwidth limitations; a video compressor which receives the modified display elements selected above and generates there from a compressed video stream for each one of said plurality of programs; and a transmitter for the transmission of the

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[4]Although the prior art status of the cited art is not being challenged at this time, Applicants reserve the right to do so in the future. Accordingly, any arguments and amendments made herein should not be construed as acquiescing to any prior art status or asserted teachings of the cited art.

[5] In order to establish a *prima facie* case of obviousness, "the prior art reference (or references when combined) must teach or suggest all the claim limitations." MPEP § 2143 (emphasis added). During examination, the pending

plurality of compressed video streams to one or more remote locations, as recited, e.g., in claim 17.

Williams discloses enabling multiple users to concurrently access a PC-based server in a home local area network using conventional TVs as display devices. Although *Williams* discloses modulating desktop data at a server onto a video channel that is transmitted to a client, *Williams* is silent with regards to video compression (as acknowledged by the Officer Action) and does not disclose or suggest selecting display elements in response to transmission bandwidth limitations prior to modulating such data onto the video channel. Recognizing some of the deficiencies of *Williams*, the Office Action cites *Richardson*.

Richardson discloses a virtual network computing environment based on a simple display protocol for accessing graphical user interfaces on virtually any device with some form of communications link (e.g., the set top box in *Williams*). Unlike *Williams, Richardson* provides for various video encoding schemes for rendering, on the display of a client, desktops and other applications generated at a server. *Richardson*, however, does not rectify those deficiencies noted above with regards to *Williams*. In particular, *Richardson* does not disclose or suggest comparing original display elements with a set of predefined display elements stored at a server. Accordingly, *Richardson* like *Williams* cannot possibly disclose or suggest responsive to transmission bandwidth limitations that are identified by the server, selecting corresponding modified display elements from the set of predefined display elements that are most similar to one or more of the original display elements, the set of predefined elements compiled to simplify compression in accordance with said transmission bandwidth limitations; a video compressor which receives the modified display elements selected above and generates there from a compressed video stream for each one of said plurality of programs; and a transmitter for the transmission of the plurality of compressed video streams to one or more remote locations, as recited in claim 17.

Accordingly, because the combination of *Williams* and *Richardson* does not disclose or suggest each and every element of claim 17, Applicants respectfully submit that such combination does not render claim 17 unpatentable. Moreover, as previously stated with regard to claims 20 and 45, these claims recite methods with similar elements as those described above

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claims are given their broadest reasonable interpretation, i.e., they are interpreted as broadly as their terms reasonably allow, consistent with the specification. MPEP §§ 2111 & 2111.01.
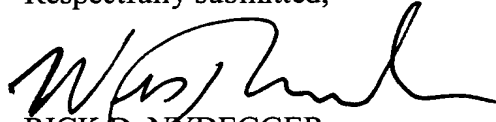
with regard to claim 17. As such, these claims are patentably distinguishable over the combination of *Williams* and *Richardson* for at least those reasons stated above with regard to claim 17. Accordingly, Applicants respectfully request withdrawal of these grounds of rejection.

Based on at least the foregoing reasons, Applicants respectfully submit that the cited prior art fails to make obvious Applicants' invention, as claimed for example, in independent claims 17, 20, and 45. Applicants note for the record that the remarks above render the remaining rejections of record for the independent and dependent claims moot, and thus addressing individual rejections or assertion with respect to the teachings of the cited art is unnecessary at the present time, but may be undertaken in the future if necessary or desirable, and Applicants reserve the right to do so.

All objections and rejections having been addressed, it is respectfully submitted that the present application is in condition for allowance, and notice to this effect is earnestly solicited. Should any question arise in connection with this application or should the Examiner believe that a telephone conference with the undersigned would be helpful in resolving any remaining issues pertaining to this application, the undersigned respectfully requests that he be contacted at +1.801.533.9800.

Dated this 12th day of January, 2006.

Respectfully submitted,

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